

### **REMARKS/ARGUMENTS**

Claim 21 has been amended as set forth above to further clarify several features of the claim. Claim 21 is amended herein for purposes of appeal. The other claims in this application have not been amended in that the proposed combination fails to teach all the limitations of the claims and the proposed combination would produce a nonsensical set of instructions.

#### **I. Rejection under 35 U.S.C. 103(a)**

Claims 1-3, 6, 7-10, 13-16, 18-20, 21-22, 24-28, 29, and 32-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 7,058,626 issued to Pan et al. (hereinafter "Pan") in view of U.S. Patent No. 6,327,590 issued to Chidlovskii et al. (hereinafter "Chidlovskii") and further in view of U.S. Patent No. 6,640,218 issued to Golding et al. (hereinafter "Golding"). Applicants respectfully disagree with the rejection. Independent claim 1 includes the following combination of features that are not taught or suggested by the cited references:

a search engine manager having a client interface configured to allow the search engine manager to communicate with a client, a query generation module configured to receive a search query from the client interface and **to generate a standard query**, and a wrapper interface configured to provide the standard query to a search engine wrapper, wherein the search engine manager is configured to receive a search query from a client and to translate the search query to a standard query, **wherein the standard query is universally formatted for a plurality of search engine wrappers registered with the search engine manager**, and to communicate the standard query **from the search engine manager to each of the plurality of search engine wrappers registered with the search engine manager**; and

each of the search engine wrappers having a manager interface configured to provide standardized communication between the search engine wrapper and the search engine manager, **a query translation module configured to translate the standard query received from the search engine manager into the native format query associated with the registered search engine**, and a search engine interface configured to allow the search engine wrapper to communicate with the registered search engine in the native format of the registered search engine, wherein each of the search engine wrappers are configured to translates the standard query into a

different native format, and to return results from the registered search engine to the search engine manager.

The above combination of features are not taught or otherwise suggested by the cited references. The Office Action attempts to fragment the references into a plurality of unassociated pieces. The Office Action then attempts to puzzle the fragments together to come up with the features of the claims. However, the puzzled fragments fail to consider both the references and the claims as a whole and the resulting proposed combination is nonsensical. The references explicitly teach away from features of the claims. The office action, however, attempts to ignore these teachings and reengineer the three references into something far different than what is being taught.

The office action states that Pan teaches "wherein the standard query is universally formatted for a plurality of search engines registered with the search engine manager, and to communicate the standard query from the search engine manager to each of the plurality of search engines registered with the search engine manager." *Office Action*, page 3. This statement is not true. Pan teaches receiving a search term in a first language (e.g. French). A search engine is then selected from multiple search engines. The query term in the first language is then translated to the specific language (e.g. English) used by the selected search engine. Pan is teaching the exact opposite of the statement in the Office Action. Pan is teaching that the query is translated into a specific grammatical language associated with the search engine. *See Pan* col. 8, lines 30-60. Independent claim 1 specifically recites "a search engine manager having a client interface configured to allow the search engine manager to communicate with a client, a query generation module configured to receive a search query from the client interface and to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper, wherein the search engine manager is configured to receive a search query from a client and to translate the search query to a standard query, wherein the standard query is universally formatted for a plurality of search engine wrappers registered with the search engine manager, and to communicate the standard query from the search engine manager to each of the plurality of search engine wrappers registered with the search engine manager." Pan cannot possibly teach universal formatting as the Office Action suggests

because the Pan is only concerned about a single selected search engine and if the query was universally formatted the search engines associated with other languages simply would not understand the query.

The Office Action then cites to Golding as teaching that a search engine normalizes the query. *Office Action*, page 5. The Office Action attempts to combine this feature with Pan's teaching above. However, such a combination is contrary to the teaching of Pan that the query is translated into a query that is specific for the search engine. Furthermore, Golding is teaching that the search engine normalizes the query. *See Golding* at col. 6, lines 55-60. Independent claim 1 recites that a search engine manager generates a standard query. Independent claim 1 distinguishes the search engine manager from the search engine. The Office Action is attempting to read features out of the cited reference and out of the claims. This reconstruction is not allowed in that the references and the claims must be read as a whole.

The Office Action continues by citing to Chidlovskii as teaching a wrapper. Applicants assert that there are hundreds of different types of wrappers in the software industry. Wrappers are used for all sorts of things. The mere fact that Chidlovskii teaches a wrapper, does not mean that Chidlovskii teaches a wrapper as presented in claim 1. Claim 1 specifically recites "each of the search engine wrappers having a manager interface configured to provide standardized communication between the search engine wrapper and the search engine manager, a query translation module configured to translate the standard query received from the search engine manager into the native format query associated with the registered search engine, and a search engine interface configured to allow the search engine wrapper to communicate with the registered search engine in the native format of the registered search engine, wherein each of the search engine wrappers are configured to translates the standard query into a different native format, and to return results from the registered search engine to the search engine manager." Chidlovskii teaches a wrapper for extracting data. Chidlovskii states that a wrapper is a tool used by a meta-searcher that scans the HTML files returned by the search engine, drops the markup instructions and extracts the information related to the query. Then the wrapper takes the answers from the different providers, puts them in a new format and generates an HTML file that can be viewed by the user. *See Chidlovskii* at col. 5, lines 9-25. Chidlovskii does not teach

a search engine wrapper that translates a standard query received from a search engine manager into a native format query associated with the registered search engine. Applicants respectfully request reconsideration.

Independent claim 7 includes the following combination of features that are not taught or suggested by the cited references:

providing a search engine manager having a client interface configured to allow the search engine manager to communicate with the client, a query generation module configured to receive a search query from the client interface and to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper;

providing a search engine wrapper having a manager interface configured to provide standardized communication between the search engine manager and the search engine wrapper, a query translation module configured to translate the standard query received from the search engine manager into the native format query associated with the registered search engine, and a search engine interface configured to allow the search engine wrapper to communicate with the registered search engine in the native format of the registered search engine;

receiving a search query, at a search engine manager, having a plurality of search parameters, the search query being generated by a search client;

building a standard query from the search query, wherein the standard query is universally configured to be understandable by a plurality of search engine wrappers;

issuing the standard query to each of the plurality of search engine wrappers;

receiving the standard query at each of the plurality of search engine wrappers;

at each of the plurality of search engine wrappers, translating the standard query to a native format query for a search engine associated with the search engine wrapper, wherein the native format query is unique to the search engine associated with the search engine wrapper; and

issuing, from each of the search engine wrappers, the unique native format query to the search engine associated with the search engine wrapper.

The office action states that Pan teaches "wherein the standard query is universally formatted for a plurality of search engines registered with the search engine manager, and to

communicate the standard query from the search engine manager to each of the plurality of search engines registered with the search engine manager." *Office Action*, page 3. This statement is not true. Pan teaches receiving a search term in a first language (e.g. French). A search engine is then selected from multiple search engines. The query term in the first language is then translated to the specific language (e.g. English) used by the selected search engine. Pan is teaching the exact opposite of the statement in the Office Action. Pan is teaching that the query is translated into a specific grammatical language associated with the search engine. *See Pan* col. 8, lines 30-60. Independent claim 7 specifically recites "providing a search engine wrapper having a manager interface configured to provide standardized communication between the search engine manager and the search engine wrapper, a query translation module configured to translate the standard query received from the search engine manager into the native format query associated with the registered search engine, and a search engine interface configured to allow the search engine wrapper to communicate with the registered search engine in the native format of the registered search engine," and "building a standard query from the search query, wherein the standard query is universally configured to be understandable by a plurality of search engine wrappers." Pan cannot possibly teach universal formatting as the Office Action suggests because Pan is only concerned about a single selected search engine and if the query was universally formatted the search engines associated with other languages simply would not understand the query.

The Office Action then cites to Golding as teaching that a search engine normalizes the query. *Office Action*, page 5. The Office Action attempts to combine this features with Pan's teaching above. However, such a combination is contrary to the teach of Pan that the query is translated into a query that is specific for the search engine. Furthermore, Golding is teaching that the search engine normalizes the query. *See Golding* at col. 6, lines 55-60. Independent claim 7 recites that a search engine manager generates a standard query. Independent claim 7 distinguishes the search engine manager from the search engine. The Office Action is attempting to read features out of the cited reference and out of the claims. This reconstruction is not allowed in that the references and the claims must be read as a whole.

The Office Action continues by citing to Chidlovskii as teaching a wrapper. Applicants assert that there are hundreds of different types of wrappers in the software industry. Wrappers are used for all sorts of things. The mere fact that Chidlovskii teaches a wrapper, does not mean that Chidlovskii teaches a wrapper as presented in claim 7. Claim 7 specifically recites "at each of the plurality of search engine wrappers, translating the standard query to a native format query for a search engine associated with the search engine wrapper, wherein the native format query is unique to the search engine associated with the search engine wrapper." Chidlovskii teaches a wrapper for extracting data. Chidlovskii states that a wrapper is a tool used by a meta-searcher that scans the HTML files returned by the search engine, drops the markup instructions and extracts the information related to the query. Then the wrapper takes the answers from the different providers, puts them in a new format and generates an HTML file that can be viewed by the user. *See Chidlovskii* at col. 5, lines 9-25. Chidlovskii does not teach a search engine wrapper that translates a standard query received from a search engine manager into a native format query associated with the registered search engine. Applicants respectfully request reconsideration.

Independent claim 13 includes the following combination of features that are not taught or suggested by the cited references:

providing a search engine manager having a client interface configured to allow the search engine manager to communicate with the client, a query generation module configured to receive a search query from the client interface and **to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper;**

providing a plurality of search engine wrappers having a manager interface configured to provide standardized communication between the search engine manager and the search engine wrappers, a query translation module configured **to translate the standard query received from the search engine manager into the native format query associated with the registered search engine,** and a search engine interface configured to allow the search engine wrappers to communicate with the registered search engine in the native format of the registered search engine;

registering a search engine with the search engine manager to provide searching capabilities;

receiving, at the search engine manager, a client query from a client;

*building a standard query from the client query received from the client, wherein the standard query is universally formatted for the search engine wrappers;*

passing the standard query from the search engine manager to the plurality of search engine wrappers, wherein each of the plurality of search engine wrappers is associated with a different registered search engine;

*translating, at each of the search engine wrappers, the standard query to a translated query in a native format of the registered search engine associated with the search engine wrapper, wherein each of the search engine wrappers translates the standard query into a different native format;*

transmitting the translated query to the registered search engine; and

receiving results of the translated query from the registered search engine.

The office action states that Pan teaches "wherein the standard query is universally formatted for a plurality of search engines registered with the search engine manager, and to communicate the standard query from the search engine manager to each of the plurality of search engines registered with the search engine manager." *Office Action*, page 3. This statement is not true. Pan teaches receiving a search term in a first language (e.g. French). A search engine is then selected from multiple search engines. The query term in the first language is then translated to the specific language (e.g. English) used by the selected search engine. Pan is teaching the exact opposite of the statement in the Office Action. Pan is teaching that the query is translated into a specific grammatical language associated with the search engine. *See Pan* col. 8, lines 30-60. Independent claim 13 specifically recites "providing a search engine manager having a client interface configured to allow the search engine manager to communicate with the client, a query generation module configured to receive a search query from the client interface and to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper," and "building a standard query from the client query received from the client, wherein the standard query is universally formatted for the search engine wrappers." Pan cannot possibly teach universal formatting as the Office Action suggests

because Pan is only concerned about a single selected search engine and if the query was universally formatted the search engines associated with other languages simply would not understand the query.

The Office Action then cites to Golding as teaching that a search engine normalizes the query. *Office Action*, page 5. The Office Action attempts to combine this features with Pan's teaching above. However, such a combination is contrary to the teach of Pan that the query is translated into a query that is specific for the search engine. Furthermore, Golding is teaching that the search engine normalizes the query. *See Golding* at col. 6, lines 55-60. Independent claim 13 recites that a search engine manager generates a standard query. Independent claim 13 distinguishes the search engine manager from the search engine. The Office Action is attempting to read features out of the cited reference and out of the claims. This reconstruction is not allowed in that the references and the claims must be read as a whole.

The Office Action continues by citing to Chidlovskii as teaching a wrapper. Applicants assert that there are hundreds of different types of wrappers in the software industry. Wrappers are used for all sorts of things. The mere fact that Chidlovskii teaches a wrapper, does not mean that Chidlovskii teaches a wrapper as presented in claim 13. Claim 13 specifically recites "translating, at each of the search engine wrappers, the standard query to a translated query in a native format of the registered search engine associated with the search engine wrapper, wherein each of the search engine wrappers translates the standard query into a different native format." Chidlovskii teaches a wrapper for extracting data. Chidlovskii states that a wrapper is a tool used by a meta-searcher that scans the HTML files returned by the search engine, drops the markup instructions and extracts the information related to the query. Then the wrapper takes the answers from the different providers, puts them in a new format and generates an HTML file that can be viewed by the user. *See Chidlovskii* at col. 5, lines 9-25. Chidlovskii does not teach a search engine wrapper that translates a standard query received from a search engine manager into a native format query associated with the registered search engine. Applicants respectfully request reconsideration.

Independent claim 21 includes the following combination of features that are not taught or suggested by the cited references:



providing a search engine manager having a client interface configured to allow the search engine manager to communicate with the client, a query generation module configured to receive a search query from the client interface and to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper;

providing at least one search engine wrapper having a manager interface configured to provide standardized communication between the search engine manager and the search engine wrapper, a query translation module configured to translate the standard query received from the search engine manager into the native format query associated with the registered search engine, and a search engine interface configured to allow the search engine wrapper to communicate with the registered search engine in the native format of the registered search engine, wherein the at least one search engine wrapper includes a wrapper ID, wherein the search engine wrapper presents the wrapper ID to a search engine store to identify the wrapper during a registration process;

discovering at least one search engine registered with a search system by accessing the search engine store and identifying at least one search engine wrapper ID associated with the at least one search engine;

receiving a query initiated by a client accessing the search system;

building a standard query from the query initiated by the client, wherein the standard query is universally configured to be understandable by a plurality of engine wrappers;

transmitting the standard query to a plurality of search engine wrappers, wherein each search engine wrapper is configured to translate the search query into a native format that is unique to a search engine registered with the search engine wrapper;

requesting a response from each of the search engine wrappers the response including a progress update for the standard query as it is executed and the results of the standard query; and

receiving responses from each of the search engine wrappers.

The office action states that Pan teaches "wherein the standard query is universally formatted for a plurality of search engines registered with the search engine manager, and to communicate the standard query from the search engine manager to each of the plurality of

search engines registered with the search engine manager." *Office Action*, page 3. This statement is not true. Pan teaches receiving a search term in a first language (e.g. French). A search engine is then selected from multiple search engines. The query term in the first language is then translated to the specific language (e.g. English) used by the selected search engine. Pan is teaching the exact opposite of the statement in the Office Action. Pan is teaching that the query is translated into a specific grammatical language associated with the search engine. *See Pan* col. 8, lines 30-60. Independent claim 21 specifically recites "providing a search engine manager having a client interface configured to allow the search engine manager to communicate with the client, a query generation module configured to receive a search query from the client interface and to generate a standard query, and a wrapper interface configured to provide the standard query to a search engine wrapper," and "building a standard query from the query initiated by the client, wherein the standard query is universally configured to be understandable by a plurality of engine wrappers." Pan cannot possibly teach universal formatting as the Office Action suggests because Pan is only concerned about a single selected search engine and if the query was universally formatted the search engines associated with other languages simply would not understand the query.

The Office Action then cites to Golding as teaching that a search engine normalizes the query. *Office Action*, page 5. The Office Action attempts to combine this feature with Pan's teaching above. However, such a combination is contrary to the teaching of Pan that the query is translated into a query that is specific for the search engine. Furthermore, Golding is teaching that the search engine normalizes the query. *See Golding* at col. 6, lines 55-60. Independent claim 21 recites that a search engine manager generates a standard query. Independent claim 21 distinguishes the search engine manager from the search engine. The Office Action is attempting to read features out of the cited reference and out of the claims. This reconstruction is not allowed in that the references and the claims must be read as a whole.

The Office Action continues by citing to Chidlovskii as teaching a wrapper. Applicants assert that there are hundreds of different types of wrappers in the software industry. Wrappers are used for all sorts of things. The mere fact that Chidlovskii teaches a wrapper, does not mean that Chidlovskii teaches a wrapper as presented in claim 21. Claim 21 specifically recites

"transmitting the standard query to a plurality of search engine wrappers, wherein each search engine wrapper is configured to translate the search query into a native format that is unique to a search engine registered with the search engine wrapper." Chidlovskii teaches a wrapper for extracting data. Chidlovskii states that a wrapper is a tool used by a meta-searcher that scans the HTML files returned by the search engine, drops the markup instructions and extracts the information related to the query. Then the wrapper takes the answers from the different providers, puts them in a new format and generates an HTML file that can be viewed by the user. *See Chidlovskii* at col. 5, lines 9-25. Chidlovskii does not teach a search engine wrapper that translates a standard query received from a search engine manager into a native format query associated with the registered search engine.

Furthermore, applicants cannot find any teaching or suggestion in any of the references of "wherein the at least one search engine wrapper includes a wrapper ID, wherein the search engine wrapper presents the wrapper ID to a search engine store to identify the wrapper during a registration process." Applicants also cannot find any teaching of "discovering at least one search engine registered with a search system by accessing the search engine store and identifying at least one search engine wrapper ID associated with the at least one search engine." Applicants respectfully request reconsideration.

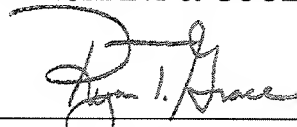
With regard to the dependent claims, they include features that are not taught or suggested by the cited references. Furthermore, those claims ultimately depend from the independent claims above, respectively. As such, they should be found allowable for at least those same reasons.

## **II. Request For Reconsideration**

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

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